



**THE CITY OF NEW YORK
LAW DEPARTMENT**

ZACHARY W. CARTER
Corporation Counsel

SPECIAL FEDERAL LITIGATION
DIVISION
100 Church Street, 3rd Floor
New York, NY 10007

JOSEPH GUTMANN
phone: (212) 356-2659
fax: (212) 356-3509
email: jgutmann@law.nyc.gov

January 17, 2019

VIA ECF

Honorable John G. Koeltl
United States District Judge
Southern District of New York
500 Pearl Street
New York, NY 10007

Re: Aitabdella Salem v. City of New York, et al.,
17-CV-4799 (JGK)

Your Honor:

I am a Senior Counsel and the attorney for defendants City of New York and Commissioner Joseph Ponte in the above-referenced matter. Defendants write to respectfully request an extension of time, from January 22, 2019 to February 12, 2019 to file their reply memorandum in further support of their motion to dismiss. This is defendants' first request for an extension of time to file their reply and plaintiff's counsel, Welton Wisham, Esq., has consented to this request. The reason for this request is that the undersigned is currently preparing for a trial in the matter of Gonzalo Cortes v. City of New York, et al., 14-CV-3014 which is pending before Judge LaShann DeArcy Hall in the Eastern District of New York. The trial is scheduled to begin on January 28, 2019, and the undersigned is engaged in extensive preparations for this trial. A brief extension of time to file a reply, until February 12, 2019, would allow defendants the opportunity to file a full and comprehensive memorandum without compromising the undersigned's readiness for the upcoming trial.

Defendants thank the Court for its consideration herein.

Respectfully submitted,

/s/

Joseph Gutmann
Senior Counsel
Special Federal Litigation Division

cc: Welton Kemilious Wisham (*By ECF*)
Counsel for Plaintiff